

MOSSER LEGAL, PLLC
Two Penn Center, Suite 1723
Philadelphia, PA 19102
215-567-1220 (phone)
215-864-7875 (fax)
www.mosserappeals.com
todd@mosserlegal.com

June 22, 2016

VIA ECF

Hon. Colleen McMahon

Chief United States District Judge,

United States District Court for the Southern District of New York

Re: 9197-5904 Quebec, Inc. v. NLG, LLC

16 civ 695 (CM)(JCF)

Your Honor:

I submit this letter on behalf of “Plaintiff” (“Quebec”) in response to Your Honor’s Order for a letter with attachments that details the relevant underlying activity in the closed state court action that Defendant (“NLG”) purported to remove to this Court.

On February 22, 2012, Quebec entered a judgment by confession against NLG in the Supreme Court of the State of New York, County of New York, at Index No. 101875/2012. *See*, Attachment ‘A.’

On May 14, 2014, NLG filed a Request for Judicial Intervention, in which it sought to vacate the judgment by confession. *See*, Attachment ‘B.’

On June 6, 2014, the state court denied this request, marking the order as a “final disposition.” *See*, Attachment ‘C.’ No appeal was taken.

On June 17, 2014, Quebec assigned its judgment against NLG to Selective Advisors Group, LLC (“Selective”). *See*, Attachment ‘D.’

On September 4, 2015, Selective filed a Satisfaction of Judgment in the state court action. *See*, Attachment ‘E.’

Thereafter, NLG apparently again attempted to open the judgment. *See*, Attachment ‘F’ at date entry 11/16/15.

Continued to page 2

22 JUNE 2016

On December 21, 2015, the state court denied NLG's motion. *See*, Attachment 'G.' No appeal was taken. Instead, forty-one days later, NLG purported to "remove" the closed state court action to this Court.

The state court action had been concluded and disposed of long before NLG's purported "removal" of the matter. As Your Honor has observed, there was simply no underlying state court action to "remove" to this Court, and NLG's attempts to attack the underlying judgment should have been pursued through the state court appeals process. As such, dismissal of this matter with prejudice is warranted.

Quebec believes that the foregoing chronology of events makes clear that this matter should be dismissed. However, to the extent that the Court would deem it necessary, Quebec is prepared to provide a formal motion and brief that outlines the applicable legal concepts that should govern, and bar, NLG's purported removal of the underlying closed state court action.

Sincerely,

/s/ Todd M. Mosser

Todd M. Mosser, Esquire

Cc: James Roland Costo, Esquire via ECF and fax to 646-619-4144

ATTACHMENT 'A'

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

Address of Plaintiff:
3765 Saint-Kevin, Ste 9
Montreal, Quebec H3T 1H8
Canada

9197-5904 Quebec, Inc.

Plaintiff,

Index No.:

against

**JUDGMENT BY
CONFESSION**

NLG, LLC, a Delaware Limited Liability Company,

Defendant.

12101875

Amount Confessed	\$5,000,000.00	
Interest	\$0.00	\$ 5,000,000.00
Costs by Statute	\$15.00	
Transcript		
Fees on Execution		
Satisfaction		
Filing Fee	\$210.00	\$ 5,000,225.00

The undersigned, Attorney at Law of the State of New York, affirms that he is the attorney of record for the Plaintiff herein and states that the disbursements specified are correct and true and have been or will necessarily be made or incurred herein and are reasonable in amount and affirms this statement to be true under the penalties of perjury.

Dated: February 16, 2012

MARZEC LAW FIRM, PC

I HEREBY CERTIFY THAT I HAVE
ADJUSTED THIS BILL OF COSTS AT
\$ 225.00

FEB 22 2012

CLERK

Darius A. Marzec, Esq.
Attorney for Plaintiff
225 Broadway, Suite 3000
New York, NY 10007
(212) 267-0200

FILED

JUDGMENT entered the 22nd day of February, 2012

On the foregoing affidavit of Confession of Judgment made by the defendant herein,
sworn to the on the 16th day of February 2012,

NOW, ON MOTION OF MARZEC LAW FIRM, PC, attorney for plaintiff, it is

ADJUDGED that 9197-5904 Quebec, Inc. Plaintiff, with the address of 3765 Saint-Kevin, Suite 9, Montreal, Quebec H3T 1H8, Canada, do recover of NLG, LLC*, Defendant, with the address of 6499 North Powerline Road, Suite 304, Fort Lauderdale, Florida 33309, the sum of \$5,000,000.00 with interest of \$0.00, making a total sum of \$5,000,000.00 together with \$225.00 costs and disbursements, as taxed by the clerk amounting in all to the sum of \$5,000,225.00 and that the plaintiff have execution therefor.

Norman Goodman
CLERK

FILED

FEB 22 2012

COUNTY CLERK'S OFFICE
NEW YORK

* Defendant's full name is:
NLG, LLC, a Delaware Limited
Liability Company

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

Index No. 10185/12

9197-5904 Quebec, Inc.,

Plaintiff,

against

NLG, LLC, *A Delaware LIMITED
LIABILITY COMPANY,*

Defendant.

**AFFIDAVIT OF
CONFESSION OF
JUDGMENT**

FILED

FEB 22 2012

COUNTY CLERK'S OFFICE
NEW YORK

STATE OF NEW YORK

COUNTY OF NEW YORK

ss.:

Raymond Houle, being duly sworn, deposes and says; that deponent is the Manager and duly authorized agent of the defendant Limited Liability Company and is duly authorized to make this Affidavit on behalf of the LLC defendant herein.

The defendant hereby confesses judgment herein and authorizes entry thereof against defendant in the sum of \$5,000,000.00.

Defendant's address is 6499 North Powerline Road, Suite 304, Fort Lauderdale, Florida 33309; Defendant authorizes entry of judgment in New York County, New York, if said residence address is not in New York State.

This confession of judgment is for a debt justly due to the plaintiff arising from the following facts: Fraud and Abuse of Process.

This affidavit, if made in connection with an agreement for the purchase for \$1,500.00 or less of any commodities for any use other than a commercial or business use upon any plan of deferred payments whereby the price or cost is payable in two or more installments, was executed, subsequent to the time a default occurred in the payment of an installment thereunder.

Sworn to before me this
16 day of *February*, 2012

Raymond Houle
.....
9197-5904 Quebec, Inc. by Raymond Houle, Manager
MANAGER, NLG LLC

Darius A. Marzec
Notary Public State of New York

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

Index No. 10875/12

9197-5904 Quebec, Inc.,

Plaintiff,

against

NLG, LLC,

Defendant.

**AFFIDAVIT OF
RAYMOND HOULE
REGARDING FACTS
SUPPORTING
JUDGMENT**

STATE OF NEW YORK

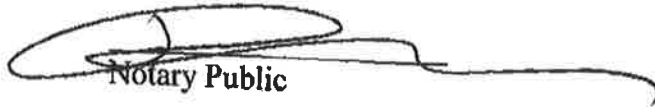
COUNTY OF NEW YORK ss.:

Raymond Houle, being duly sworn, deposes and says; that deponent is the Manager and duly authorized agent of the defendant Limited Liability Company and is duly authorized to make this Affidavit on behalf of the LLC defendant herein.

This confession of judgment is for a debt justly due to the plaintiff arising from the following facts: Defendant has consistently abused its legal position by filing frivolous litigation documents, affidavits, pleadings, and motions, in and without the state, misrepresenting the truth concerning key facts regarding the mode of operation, personnel, employees, corporate documents and status of defendant; Defendant has failed to abide by rules of court with respect to discovery, disclosures and subpoena power of the court and counsel, and has made litigation process difficult, wasteful, and expensive to adversary/ies. All actions of Defendant constitute abuse of process and fraud upon the court and parties involved, who were unduly damaged by such fraudulent conduct and abuse of process by Defendant. The conduct of Defendant was intentional and malicious and calculated to cause additional expense, delay and harassment to defendant's adversaries; such conduct was illegal, improper, unethical and unnecessary to the administration of justice and process in these matters, giving Plaintiff a cause of action.


RAYMOND HOULE

Sworn to before me on the 21 day of February, 2012.


Notary Public

~~Darius A. Marzec
Notary Public State of New York
No. 02MA6186309
Qualified in Queens County
Commission Expires 04/28/20~~

Darius A. Marzec
Notary Public State of New York
No. 02MA6186309
Qualified in Queens County
Commission Expires 04/28/2012

FILED

FEB 22 2012

COUNTY CLERK'S OFFICE
NEW YORK

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

Index No.

9197-5904 Quebec, Inc.,

Plaintiff,

against

NLG, LLC., A DELAWARE LIMITED LIABILITY
COMPANY,

Defendant.

**JUDGMENT BY CONFESSION
AFFIDAVIT OF JUDGMENT BY CONFESSION**

**ATTORNEYS FOR PLAINTIFF
Marzec Law Firm, P.C.
Darius A. Marzec, Esq.
225 Broadway, Suite 3000
New York, NY 10007
212-267-0200**

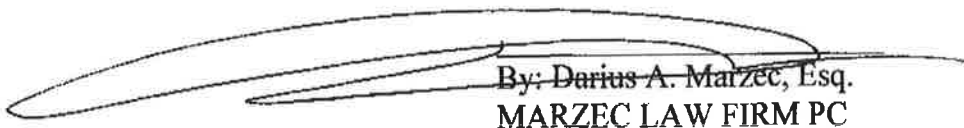
**FILED AND
DOCKETED**

FEB 22 2012

AT 10:25 A M
N.Y., CO. CLK'S OFFICE

CERTIFICATION

Pursuant to Section 130-1.1, the following documents are hereby certified:

By:  Darius A. Marzec, Esq.
MARZEC LAW FIRM PC
Attorneys for Plaintiff
225 Broadway, Ste. 3000
New York, NY 10007
(212) 267-0200



ATTACHMENT 'B'

REQUEST FOR JUDICIAL INTERVENTION

UCS-840 (3/2011)

Supreme

COURT, COUNTY OF NEW YORKIndex No: 101875/2012 Date Index Issued: 2/22/12

CAPTION

9197-5904 QUEBEC, INC.V.[NLG, LLC, a DELAWARE
LIMITED LIABILITY COMPANY]

Plaintiff(s)/Petitioner(s)

-against-

**SUPREME COURT
NEW YORK COUNTY
EX-PARTE MOTION PART****FEE PAID
MAY 08 2014**

Defendant(s)/Respondent(s)

MATRIMONIAL

- ☐ Contested
☐ Uncontested

NOTE: For all Matrimonial actions where the parties have children under the age of 18, complete and attach the **MATRIMONIAL RJJ Addendum**.**TORTS**

- ☐ Asbestos
☐ Breast Implant
☐ Environmental: _____ (specify)
☐ Medical, Dental, or Podiatric Malpractice
☐ Motor Vehicle
☐ Products Liability: _____ (specify)

☐ Other Negligence: _____ (specify)☐ Other Professional Malpractice: _____ (specify)☐ Other Tort: _____ (specify)**OTHER MATTERS**

- ☐ Certificate of Incorporation/Dissolution [see NOTE under Commercial]
☐ Emergency Medical Treatment
☐ Habeas Corpus
☐ Local Court Appeal
☐ Mechanic's Lien
☐ Name Change
☐ Pistol Permit Revocation Hearing
☐ Sale or Finance of Religious/Not-for-Profit Property

☒ Other: VACATE JUDGMENT BY
CONFESSION (specify)**COMMERCIAL**

- ☐ Business Entity (including corporations, partnerships, LLCs, etc.)
☐ Contract
☐ Insurance (where insurer is a party, except arbitration)
☐ UCC (including sales, negotiable instruments)
☐ Other Commercial: _____ (specify)

NOTE: For Commercial Division assignment requests [22 NYCRR § 202.70(d)], complete and attach the **COMMERCIAL DIV RJJ Addendum**.**REAL PROPERTY** How many properties does the applicant include?

- ☐ Condemnation
☐ Foreclosure

Property Address: _____

Street Address City State Zip

NOTE: For Foreclosure actions involving a one- to four-family, owner-occupied, residential property, or an owner-occupied condominium, complete and attach the **FORECLOSURE RJJ Addendum**.

- ☐ Tax Certiorari - Section: _____ Block: _____ Lot: _____
☐ Other Real Property: _____ (specify)

SPECIAL PROCEEDINGS

- ☐ CPLR Article 75 (Arbitration) [see NOTE under Commercial]
☐ CPLR Article 78 (Body or Officer)
☐ Election Law
☐ MHL Article 9.60 (Kendra's Law)
☐ MHL Article 10 (Sex Offender Confinement-Initial)
☐ MHL Article 10 (Sex Offender Confinement-Review)
☐ MHL Article 81 (Guardianship)
☐ Other Mental Hygiene: _____ (specify)

☐ Other Special Proceeding: _____ (specify)

- ☐ Infant's Compromise
☐ Note of Issue and/or Certificate of Readiness
☐ Notice of Medical, Dental, or Podiatric Malpractice Date Issue Joined: _____
☐ Notice of Motion Relief Sought: _____ Return Date: _____
☐ Notice of Petition Relief Sought: _____ Return Date: _____
☒ Order to Show Cause Relief Sought: VACATE JUDGMENT Return Date: _____
☐ Other Ex Parte Application Relief Sought: _____ BY CONFESSION
☐ Poor Person Application
☐ Request for Preliminary Conference
☐ Residential Mortgage Foreclosure Settlement Conference
☐ Writ of Habeas Corpus
☐ Other (specify): _____

RELATED CASES:

☐ If any related actions, including additional actions, are pending in any court, please list them in the additional spaces provided below and attach to this filing a copy of the related case file.

Case Title	Index/Case No.	Court	Judge (if assigned)	Relationship to this case
9197-5904 QUEBEC INC. v. MLG, LLC	51653/2013	NY SUPREME	HAGLER	SAME PARTIES

☐ If any related actions, including additional actions, are pending in any court, please list them in the additional spaces provided below and attach to this filing a copy of the related case file.

Un-Rep	Parties	Attorneys	Is the party/attorney listed below?	Is the party/attorney listed below?
	9197-5904 QUEBEC INC. Last Name: QUEBEC First Name: INC. Primary Role: Secondary Role (if any):	MARZEC DARIUS FIRM NAME: THE MARZEC LAW FIRM Street Address: 225 BROADWAY, #3009 City: NEW YORK, State: NY, Zip: 10007 Phone:	<input type="radio"/> YES <input checked="" type="radio"/> NO	
	MLG, LLC Last Name: MLG First Name: LLC Primary Role: Secondary Role (if any):	COSTO JAMES FIRM NAME: M PARK PLACE #600 Street Address: NEW YORK, City: NY, State: NY, Zip: 10007 Phone:	<input type="radio"/> YES <input checked="" type="radio"/> NO	
	Last Name: First Name: Primary Role: Secondary Role (if any):	646-543-0406 COSTO FIRM NAME: COSTO LAW Street Address: City: State: Zip: Phone: Fax: e-mail:	<input type="radio"/> YES <input checked="" type="radio"/> NO	
	Last Name: First Name: Primary Role: Secondary Role (if any):	Last Name: First Name: Firm Name: Street Address: City: State: Zip: Phone: Fax: e-mail:	<input type="radio"/> YES <input checked="" type="radio"/> NO	

I AFFIRM UNDER THE PENALTY OF PERJURY THAT, TO MY KNOWLEDGE, OTHER THAN AS NOTED ABOVE, THERE ARE AND HAVE BEEN NO RELATED ACTIONS OR PROCEEDINGS, NOR HAS A REQUEST FOR JUDICIAL INTERVENTION PREVIOUSLY BEEN FILED IN THIS ACTION OR PROCEEDING.

ATTACHMENT 'C'

SUPREME COURT OF THE STATE OF NEW YORK — NEW YORK COUNTY

PRESENT: HAGLER
JusticePART 179197-5904 QUREDEC, INC.

INDEX NO.

101875/12

MOTION DATE

MOTION SEQ. NO.

01

MOTION CAL. NO.

NLG, LLC.

The following papers, numbered 1 to _____ were read on this motion to/for _____

Notice of Motion/ Order to Show Cause — Affidavits — Exhibits ...

Answering Affidavits — Exhibits _____

Replying Affidavits _____

PAPERS NUMBERED

Cross-Motion: ☐ Yes ☐ No

Upon the foregoing papers, it is ordered that this motion OSC is declined
as it has been abandoned
for more than a month.

FILED

JUN 09 2014

COUNTY CLERK'S OFFICE
NEW YORKDated: 6/6/14SHLOMO HAGLER
J.S.C. J.S.C.Check one: ☒ FINAL DISPOSITION ☐ NON-FINAL DISPOSITIONCheck if appropriate: ☐ DO NOT POST ☐ REFERENCEMOTION/CASE IS RESPECTFULLY REFERRED TO JUSTICE
FOR THE FOLLOWING REASON(S):

6/22/2016

Case Information

INDEX NO.:	101875-2012
PLAINTIFF:	9197-5904 QUEBEC, INC.
DEFENDANT:	NLG, L.L.C.
CASE STATUS:	DISPOSED
ACTION:	OTHER
LAST UPDATE:	06-22-2016 10:00AM
JUSTICE:	HAGLER, SHLOMO S.

[Home](#) / [SCROLL](#) / CASE INFORMATION

DATE CASE COMMENCED / BEGUN

02-22-2012

DATE RJI FILED WITH COUNTY CLERK

Friday, May 9, 2014

DISPOSITION DEADLINE

Tuesday, Aug 9, 2016

PRELIMINARY CONFERENCE HELD

-

COMPLIANCE CONFERENCE DATE HELD

-

DATE NOI DUE

-

DATE NOI WAS FILED

-

CASE DISPOSED / CONCLUDED

Friday, Jun 6, 2014

[BACK](#)[NEW SEARCH](#)

CASE INFORMATION: Provides information on conferences held and case processing standards. The several deadlines listed are based upon the Differentiated Case Management track assigned and the standards associated therewith. The deadlines as shown here do not reflect any specific deadlines that may have been set by the Justice in a preliminary conference or other order, which control. See Uniform Rule 202.19.



60 Centre Street, New York NY 10007

Copyright © 2006 Unified Court System

ATTACHMENT 'D'

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No. 101875/2012

-----X
9197-5904 QUEBEC INC
Plaintiff,

-against-

NLG LLC

Defendant.

ASSIGNMENT OF JUDGMENT

This indenture made the 30th day of April 2014, between 9197-5904 Quebec inc a Canadian Corporation located at 5552 Queen Mary Road Suite #4, City of Hampstead, State of Quebec, Canada H3X 1V9 party of the first part, and Selective Advisors Group, LLC, located at 16192 Coastal Highway Lewes. Delaware 19958 County of Sussex, party of the second part,

WHEREAS, on the 22nd day of February, 2012 a judgment was entered in the Supreme Court, County of NY, in favor of 9197-5904 Quebec inc , and against NLG LLC, a Delaware Limited Liability Company located at 854 Pheasant Run Road, West Chester, PA in the sum of \$5,000,000.00 plus interest from February 22nd 2012 plus costs of \$225.00, and said judgment was duly entered in the office of the Clerk of the County of New York State, NY on the 22nd day of February 2012.

NOW THIS INDENTURE WITNESSETH, that the said party of the first part, in consideration of \$10 and other valuable consideration to them duly paid has sold, and by these presents does assign, transfer and set over, unto the said party of the second part, Selective Advisors Group, LLC, its executors, administrators, and assigns, the said judgment and all sum or sums of money that may be had or obtained by means thereof, or on any proceedings to be had thereupon.

Also, the said party of the first part does hereby constitute and appoint the said party of the second part, its executors, administrators, and assigns, their true and lawful attorney irrevocable, with power of substitution and revocation, for the use and at the proper costs and charges of the said party of the second part, to ask, demand, and receive, and to obtain executions, and take all lawful ways for the recovery of the money due or to become due on said judgment and on payment to acknowledge satisfaction, or to discharge the same; and attorneys one or more under them for the purpose aforesaid, to make and substitute, and at pleasure to revoke; hereby ratifying and confirming all that their said attorney or substitute shall lawfully do in the premises. Also, the said party of the first part does covenant, that that they will not collect or receive the full payment of the judgment, or any part thereof, nor release or discharge the said judgment but will allow all lawful proceedings therein to be taken by the said party of the second part, saving the said party of the first part harmless of and from any costs in the premises.. This assignment is made without recourse to the party of the first part in any event whatsoever.

FILED
COUNTY CLERK
EX. 20047
2016 JUN 17 PM 4:42

IN WITNESS WHEREOF, the party of the first part has hereunto set his hand and seal the day and year first above written.

On behalf of 9197-5904 QUEBEC INC :

Raymond Houle
RAYMOND HOULE, president

ACKNOWLEDGEMENT

Province of Quebec
State of _____
County of D'Arcy McGee ss.:

On the 2 day of June in the year 2014, before me, Raymond Houle, personally appeared, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

Pierrette Tardif
Notary Public

Raymond Houle
Raymond Houle

CERTIFICATE OF CONFORMITY

I, Pierrette Tardif, a duly licensed notary public in the Province of Quebec, Canada, affirm under penalty of perjury and certify that I witnessed the signature of Raymond Houle as applied to the document annexed to this certificate, which was signed and dated on June 2 2014. The matter in which was signed was, and is, in accordance with, and conforms to, the laws for taking oaths at acknowledgments, in the Province of Quebec, Canada.

Dated: June 2/2014 Pierrette Tardif
NOTARY PUBLIC
NAME:



ATTACHMENT 'E'

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
SELECTIVE ADVISORS GROUP, LLC, A DELAWARE
LIMITED LIABILITY COMPANY,
Assignee of 9197-5904 Quebec, Inc

Plaintiff,

Index No:101875/2012

SATISFACTION OF
JUDGMENT

- against -

NLG, LLC, A DELAWARE LIMITED LIABILITY
COMPANY,

Defendant.

-----X

FILED
COUNTY CLERK
N.Y. COUNTY
2015 SEP -4 PM 3:11

SATISFACTION OF JUDGMENT

WHEREAS, a judgment was entered in the above entitled action On February 22, 2012 In favor of 9197-5904 QUEBEC, INC Against NLG, LLC In the sum of \$5,000,000.00 plus costs of \$225.00, and said \$5,000,225.00 judgment

Which was docketed in the Office of the Clerk of the County of New York, On February 22, 2012 and

WHEREAS said judgment has been assigned on April 30, 2014 to Selective Advisors Group, LLC and

WHEREAS said judgment has been paid in full (Plaintiff has accepted a partial payment that is hereby deemed as payment in full satisfaction of the judgment) on September 1, 2015 and the amount of \$0.00 remains unpaid, and

It is certified that there is no outstanding execution with the Sheriff or Marshal within the State of New York, and

WHEREAS the undersigned is the holder of said judgment and said judgment has not been assigned,

THEREFORE, full satisfaction of the judgment is hereby acknowledged and said Clerk is hereby authorized and directed to make an entry of said satisfaction on the docket of said judgment.

IN WITNESS WHEREOF, the party of the first part has hereunto set his hand and seal the day and year first above written.

On behalf of
SELECTIVE ADVISORS GROUP, LLC:

Dated: 9/3/15

Sean Neil Meehan
Sean Neil Meehan, manager

ACKNOWLEDGEMENT

COUNTY OF Canaan

On the 3rd day of September the year 2015 before me, Sean Neil Meehan, the undersigned, personally appeared personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacities and that by his/her/their signature(s) on the instrument, the



individual(s), or the person upon behalf of which the individual(s), or the person upon
behalf of which the individual(s) acted, executed the instrument.

Diane Bibeau
Notary Public

Sean Neil Meehan
Sean Neil Meehan

CERTIFICATE OF CONFORMITY

I, DIANE BIBEAU, a duly licenced notary public in the province of
QUEBEC Canada, affirm under penalty of perjury and certify that I witnessed the
signature of Sean Neil Meehan as applied to the document annexed to this certificate,
which was signed and dated on September 3th, 2015. The matter in which acknowledged,
in accordance with, and conforms to, the laws for taking oaths at acknowledgements, in
the province of Quebec, Canada.

Dated: September 3th, 2015

Diane Bibeau
NOTARY PUBLIC
NAME:



AFFIRMATION OF SERVICE

STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

I, James Vlahadamis, being sworn, say, I am an attorney duly admitted to practice law in the State of New York. On September 3, 2015, I served the within Notice of Filing of Judgment Satisfaction and Satisfaction of Judgment by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to the following person at the last known address set forth after the name:

TO: THE LAW OFFICES OF ARI MOR, ESQ
 347 E 65th Street, Suite 2RW
 New York, New York 2RW
 (347) 850-0578
 ari.mor.esq@gmail.com

ATTORNEY FOR DEFENDANT
NLG, LLC, a Delaware Limited Company

JONATHAN M. BORG BEDELL & FORMAN LLP
44 Wall Street, 10th Floor
(646) 219-7551
jborg@bedell-forman.com

ATTORNEY FOR ADR MIAMI LLC ("ADRM")

Vlahadamis & Hillen, LLP

By: /s/ James F. Vlahadamis
 James F. Vlahadamis, Esq.
 148 E. Montauk Highway
 Suite 3
 Hampton Bays, New York 11946

AFFIRMATION OF SERVICE

STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

I, James Vlahadamis, being sworn, say, I an attorney duly admitted to practice law in the State of New York. On September 3, 2015, I served the within Notice of Filing of Judgment Satisfaction and Satisfaction of Judgment by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to the following person at the last known address set forth after the name:

TO: THE LAW OFFICES OF ARI MOR, ESQ
 347 E 65th Street, Suite 2RW
 New York, New York 2RW
 (347) 850-0578
 ari.mor.esq@gmail.com

ATTORNEY FOR DEFENDANT
NLG, LLC, a Delaware Limited Company

JONATHAN M. BORG BEDELL & FORMAN LLP
44 Wall Street, 10th Floor
(646) 219-7551
jborg@bedell-forman.com

ATTORNEY FOR ADR MIAMI LLC ("ADRM")

Vlahadamis & Hillen, LLP

By: /s/ James F. Vlahadamis
 James F. Vlahadamis, Esq.
 148 E. Montauk Highway
 Suite 3
 Hampton Bays, New York 11946

COP

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
SELECTIVE ADVISORS GROUP, LLC, A DELAWARE
LIMITED LIABILITY COMPANY,
Assignee of 9197-5904 Quebec Inc
Plaintiff, Index No:101875/2012

NOTICE OF FILING
SATISFACTION OF
JUDGMENT

- against -

NLG, LLC, A DELAWARE LIMITED LIABILITY
COMPANY,
Defendant.

-----X

PLEASE TAKE NOTICE that the Plaintiff-Assignee Selective Advisors Group, LLC is
hereby filing a Satisfaction of Judgment.

Dated: September 3, 2015
New York, New York

Vlahadamis & Hillen, LLP

By: /s/ James F. Vlahadamis
James F. Vlahadamis, Esq.
148 E. Montauk Highway
Suite 3
Hampton Bays, New York 11946

TO: THE LAW OFFICES OF ARI MOR, ESQ
347 E 65th Street, Suite 2RW
New York, New York 2RW
(347) 850-0578
ari.mor.esq@gmail.com

ATTORNEY FOR DEFENDANT
NLG, LLC, a Delaware Limited Company

JONATHAN M. BORG BEDELL & FORMAN LLP
44 Wall Street, 10th Floor
(646) 219-7551
jborg@bedell-forman.com

ATTORNEY FOR ADR MIAMI LLC ("ADRM")

JUDGMENT DOCKET UPDATE CONTINUED
CONTROL NUMBER : 002949508 - 01

*** CREDITOR ATTORNEY ***

NAME FORMAT C : MARZEE LAW FIRM P C
ADDRESS NUMBER: 225 STREET: BROADWAY SUITE 3000
CITY : NEW YORK NY ZIP CODE: 10007
*** SATISFACTION DATA ***

TYPE: SHERIFF'S EXECUTION:
DATE: / / OPERATOR ID:

REMARKS: Y (Y OR N)

MAKE CHANGES AND PRESS ENTER

PRESS: PF2- CANCEL UPDATE, PF7- RETURN TO THE FIRST PAGE, ENTER- UPDATE RECORD

USER: WERNHAM COUNTY CLERKS OFFICE NEW YORK
TERM: PF24 JUDGMENT DOCKET BOOK UPDATE
CONTROL NUMBER : 002949508 - 01

DATE: 06/17/2014
TIME: 16:37:40

*** DOCKETING DATA ***

DOCKETING DATE: 02 / 22 / 2012
TIME: 10 : 25
EFFECTIVE DATE : 02 / 22 / 2012
TIME: 10 : 25

*** SOURCE DOCUMENT ***

TYPE: J JUDGMENTS
COUNTY: 31 NEW YORK
COURT: S SUPREME COURT
TOTAL DEBTORS: 01
CLERK/SEQ # : ESMITH1 001 INDEX NUMBER: 101875/12

*** DEBTOR/CORPORATION ***

NAME FORMAT C : NLG LLC A DELAWARE LIMITED LIABILITY CO
ADDRESS NUMBER: 6499 STREET: NORTH POWERLINE RD STE304
CITY : FT LAUDERDALE FL ZIP CODE: 33309
OCCUPATION :

*** CREDITOR ***

NAME FORMAT C : 9197-5904 QUEBEC INC
ADDRESS NUMBER: 3765 STREET: SAINT-KEVIN STE 9
CITY : MONTREAL QUEBEC ZIP CODE: 00000

AMOUNT: \$5000225.00

INTERIM DISPOSITION:

MAKE CHANGES AND PRESS ENTER

PRESS: PF1- HELP, PF2- CANCEL UPDATE, PF8- 2ND PAGE DATA, ENTER- UPDATE RECORD

USER: WERNHAM COUNTY CLERKS OFFICE NEW YORK DATE: 06/17/2014
 TERM: PF24 JUDGMENT DOCKET AND LIEN BOOK SYSTEM TIME: 16:37:44
 REMARKS UPDATE LAST PAGE: 0001

BOOK TYPE: 01

CONTROL NUMBER: 002949508 - 01

DATE	REMARKS
02222012	CREDITOR'S ADDRESS IS AS FOLLOWS:
02222012	3765 SAINT-KEVIN, SUITE 9
02222012	MONTREAL, QUEBEC H3T 1H8
02222012	CANADA
02222012	DEBTOR: NLG LLC, A DELAWARE LIMITED LIABILITY COMPANY
06172014	JUDGMENT ASSIGNED TO: SELECTIVE ADVISORS GROUP, LLC DOING BUSINESS AT
06172014	16192 COASTAL HIGHWAY, LEWES, DELAWARE 19958, COUNTY OF SUSSEX.

PRESS:PF1- HELP, PF2- RETURN, PF7- SCR UP, PF8- SCR DOWN, ENTER- APPLY UPDATES

ATTACHMENT 'F'

6/22/2016

NYCCO Name/Index Details

101875/2012Plaintiff : **9197 5904 QUEBEC INC**

Plaintiff Attorney :

Defendant : **NLG LLC**

Defendant Attorney :

Remarks :

Opened : **09/30/2012**Type : **Supreme Court General Index Reg. (General)**

Filed	Actions	Rec. Room
09/08/2014	SUPPLEMENTAL AFFIRMATION	09/30/2014
09/08/2014	MEMORANDUM OF LAW	10/01/2014
11/06/2014	ORDER TO SHOW CAUSE FEE PAID	-----
12/04/2014	AFFIRMATION IN OPPOSITION SEQ 004	12/16/2014
12/04/2014	AFFIRMATION OF SERVICE, SEQ 004	12/16/2014
12/04/2014	ORDER TO SHOW CAUSE ON AN APPLICATION TO WITHDRAW AS COUNSEL, SEQ 004	12/16/2014
12/04/2014	ORDER SIGNED IAS PT 17 SEQ 004 MOTION IS GRANTED	12/05/2014
01/15/2015	NOTICE OF APPEARANCE	01/16/2015
03/02/2015	ORDER TO SHOW CAUSE FEE PAID	-----
03/17/2015	RECEIVED PAPERS SEQ 005	03/17/2015
03/17/2015	ORDER SIGNED PT 17 SEQ 005 MOTION IS DENIED	03/17/2015
03/17/2015	ORDER TO SHOW CAUSE ON AN APPLICATION TO HAVE FORMER COUNSEL JOSEPH J. NEIRMAN..., SEQ 005	03/17/2015
03/17/2015	AFFIRMATION IN OPPOSITION SEQ 005	03/17/2015
05/15/2015	ORDER TO SHOW CAUSE FEE PAID	-----
05/19/2015	RECEIVED PAPERS SEQ#002	05/19/2015
05/19/2015	CROSS MOTION SEQ#002	05/19/2015
05/19/2015	DECISION AND ORDER SEQ SEQ#001	05/19/2015
05/19/2015	AFFIRMATION OF SERVICE SEQ#002	05/19/2015
05/19/2015	AFFIRMATION REPLY SEQ#002	05/19/2015
05/19/2015	AFFIRMATION OF SERVICE SEQ#002	05/19/2015
05/19/2015	AFFIRMATION OF SERVICE SEQ#001	05/19/2015
05/19/2015	affirmation exhibits	05/20/2015
05/19/2015	AFFIDAVIT	05/20/2015
05/19/2015	AFFIDAVIT	05/20/2015
05/19/2015	ORDER SIGNED IAS PART 17 SEQ 03 MOTION IS MARKED OFF CALENDAR PENDING AN AUTOMATIC STAY IN THE BANKRUPTCY CASE	05/19/2015
05/19/2015	ORDER SIGNED IAS PART 17 SEQ 02 MOTION IS MARKED OFF CALENDAR PENDING A STAY IN THE BANKRUPTCY COURT	05/19/2015
05/19/2015	RECEIVED PAPERS	05/19/2015

6/22/2016

NYCCO Name/Index Details

05/19/2015	AFFIRMATION	05/19/2015
05/19/2015	ORDER TO SHOW CAUSE	05/19/2015
05/19/2015	AFFIDAVIT amended	05/19/2015
05/19/2015	NOTICE OF APPEARANCE	05/19/2015
05/19/2015	AFFIDAVIT	05/19/2015
05/19/2015	notice	05/19/2015
05/19/2015	notice	05/19/2015
05/19/2015	AFFIDAVIT	05/19/2015
06/23/2015	IAS PART 17 SEQ 06 MOTION IS MARKED OFF-CALENDAR	06/23/2015
06/23/2015	AFFIDAVIT IN SUPPORT, SEQ 006	06/25/2015
06/23/2015	AFFIRMATION OF EMERGENCY, SEQ 006	06/25/2015
06/23/2015	MEMORANDUM OF LAW OF NON-PARTY ADR MIAMI, LLC IN SUPPORT OF ITS MOTION..., SEQ 006	06/25/2015
06/23/2015	ORDER TO SHOW CAUSE SEQ 006	06/25/2015
06/23/2015	ORDER TO SHOW CAUSE SEQ 006	06/25/2015
10/29/2015	AFFTS,NOTICE OF MOTION FEE PAID	*** **
11/16/2015	ORDER TO SHOW CAUSE FEE PAID	*** **
11/16/2015	AFFTS,NOTICE OF MOTION seq 007	11/16/2015
11/16/2015	LETTER	11/16/2015
11/16/2015	PT 17 SEQ 007 MOTION IS PERMITTED TO BE WITHDRAWN PER LETTER	11/16/2015
12/22/2015	IAS PART 17 SEQ 8 - MOTION DENIED	12/22/2015
12/22/2015	ORDER TO SHOW CAUSE seq 008	12/22/2015
02/01/2016	DEFENDANT NLG,LLC'S NOTICE OF REMOVAL	02/01/2016

Total Row Count in Report- 49

ATTACHMENT 'G'

2115
SUPREME COURT OF THE STATE OF NEW YORK
NEW YORK COUNTY

PRESENT: SHLOMO HAGLER
J.S.C. Justice

PART 17

9197-5904 Quebec, Inc

INDEX NO. 101875/12

MOTION DATE _____

MOTION SEQ. NO. 808

NLG, LLC

The following papers, numbered 1 to _____, were read on this motion to/for _____

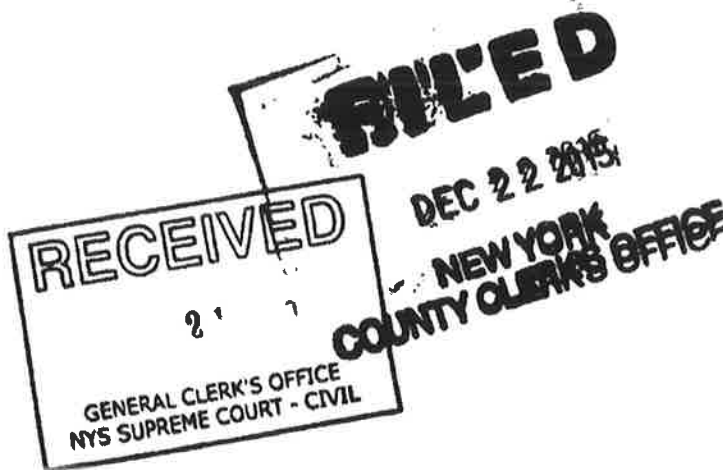
Notice of Motion/Order to Show Cause — Affidavits — Exhibits _____ | No(s). _____

Answering Affidavits — Exhibits _____ | No(s). _____

Replying Affidavits _____ | No(s). _____

Upon the foregoing papers, it is ordered that this motion is

denied
and appearance considered



Dated: 12/24/15

SHLOMO HAGLER
J.S.C.

CHECK ONE: _____ ☐ CASE DISPOSED ☒ NON-FINAL DISPOSITION
CHECK AS APPROPRIATE: _____ MOTION IS: ☐ GRANTED ☒ DENIED ☐ GRANTED IN PART ☐ OTHER
CHECK IF APPROPRIATE: _____ ☐ SETTLER'S ORDER ☐ SUBMIT ORDER